

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter 7 Estate of  
Bernard L. Madoff,

Plaintiff,

v.

151797 CANADA INC.,

Defendant.

Adv. Pro. No. 10-04631 (CGM)

**STIPULATION AND ORDER TO EXTEND RESPONSE  
DEADLINE AND ADJOURN ARGUMENT DATE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-*III*, and the substantively consolidated chapter 7 estate of Bernard L. Madoff

individually, by and through his counsel, Baker & Hostetler LLP, and 151797 Canada Inc. (“Defendant”) by and through its counsel, Laurence May, Esq. of Eiseman Levine Lehrhaupt & Kakoyiannis, P.C. (collectively, the “Parties”), hereby stipulate and agree to the following:

**WHEREAS**, on November 18, 2022, the Trustee filed his motion for summary judgment (the “Motion”) in the above-referenced adversary proceeding, ECF Nos. 55–61;

**WHEREAS**, the Parties conferred and agreed to request that the hearing on the Motion be adjourned from December 14, 2022 to January 18, 2023 at 10:00 am (prevailing Eastern time); and

**WHEREAS**, the Parties further agreed to request that Defendant’s response to the Motion be due on December 16, 2022 and the Trustee’s reply in further support of his Motion be due January 11, 2023.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the Parties, and **SO ORDERED**, by the Court, that:

1. Defendant shall submit its opposition to the Trustee’s Motion on or before December 16, 2022.
2. The Trustee shall submit his reply in further support of his Motion on or before January 11, 2023.
3. The hearing on the Motion is adjourned from December 14, 2022 to January 18, 2023 at 10:00 am (prevailing Eastern time).

Dated: November 29, 2022  
New York, New York

*/s/ Nicholas J. Cremona*  
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Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter  
7 Estate of Bernard L. Madoff*

*/s/ Laurence May*  
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*Attorney for Defendant*

**Dated: November 30, 2022**  
**Poughkeepsie, New York**



*/s/ Cecelia G. Morris*

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**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**